

Carol,

Pls look this over + add n clarify.

I need to have this done in final form  
this afternoon. *Don 7603*

DRAFT 5/24/89

CARRIER

Possible RCRA Involvement at Carrier Air Conditioner  
located in Collierville, TN.

Ben Moore, Engineer  
West Unit

Doyle T. Brittain, Chief  
West Unit

✓ The above-mention<sup>d</sup> subject has been investigated. Comments on the results  
of that investigation <sup>are</sup> listed below:

#### Facility Background

✓✓ Carrier Air Conditioner manufactures residential air conditioning units  
in 2 through 5 ton sizes, including heat pumps, remote and split air  
conditioners, and package equipment. The plant does sheet metal and  
coil fabrications, assembles and processes the units, and crates them  
for final shipment. Processes include degreasing operations for coil  
fabrications, painting, and large appliance finishing operations.

- In November 1980, Carrier Air Conditioning notified under RCRA as  
a generator and a TSD facility by way of a Part A interim status  
application.
- On January 4, 1982, Carrier requested withdrawal of TSD status indicating  
that they were a protective filer. Presently, Carrier is classified as a  
small quantity generator.

#### Contamination Information

Three potential sources of trichloroethylene (TCE) contamination:

- 1) A wastewater lagoon closed <sup>early</sup> ~~in about~~ November 1980.
- 2) A spill of TCE from a degreaser in 1979 and
- ✓ 3) A sudden uncontrolled discharge of TCE from the <sup>u</sup>rupture of an underground  
pipe in January 1985. (No soil cleanup record 350 gal from 1000 gal spilled).  
✓ One or all of these sources is responsible for the contamination of 2 of wells in  
the city of Collierville water system.

recovered about about



10626289

Present Data

- Water from the two contaminated wells are being <sup>aerated</sup> ~~aerated~~ before being pumped to the city treatment plant. Test results as of July 1988 are listed below:

<u>Date</u>	<u>East Well</u>	<u>West Well</u>	<u>AA</u> <u>BC</u>	<u>Finished</u> <u>Water</u>	<u>STD</u>	<u>Dwel</u>
July	12.00 5.2	3.4 10.2	2.35 1.75	-- --	5	260

- AABC - Aeration before chlorination in treatment plant
- STD - Drinking water standard
- DWEL - Drinking Water Equivalent Level lifetime ingestion; assuming 100% exposure from drinking. At least 1/2 of this valve is needed to place public on alternative water supply.

- ppb

Enforcement Activities

- June 1987 - Carrier Mode Update #7 for CERCLA "NPL". (Scnd 35.57)
- November 1988 - CERCLA Notice letter
- January 13, 1989 - Negotiation meeting between Carrier, ORC and CERCLA personnel.
- January 20, 1989
- March 2, 1989 - CERCLA Special Notice letter
- March 31, 1989 - Carrier response letter requesting <sup>that</sup> ~~for~~ clean-up activities at the site be administered under RCRA § 3008(a) and not § 3008(h). However, Carrier would be willing to use the corrective action Model of § 3008(h) as the basis for planning only.

✓  
April 28, 1989 -  
negotiation  
meeting  
between  
Carrier,  
Pat Tobin,  
ORC, +  
CERCLA  
personnel.

Recommendation/Conclusion

- After reviewing all the above information and talking with Chuck ~~Retrospect~~ of ATSDR a \$7003 Iminent Hazard Order is not warrented in this case due the level of TCE in the drinking water.
- ✓ - Because of the 1985 spill, Carrier could be in violated <sup>ion</sup> of § 262.34(d)(iv)(B) (Generators) ~~(iv)(B)~~ not cleaning up the hazardous waste and any contaminated materials <sup>for</sup> or soil.

✓ If Carrier is proposing to clean up the 1985 spill, that action could subject them to §270.1(c)(3)(ii)(Permit Programs). This intern could subject them to the applicable requirements of §264(TSD).

- The only drawback to RCRA taking the lead in this situation is the lagoon where wastewater was stored and which was closed in early November 1980. Whereas, §3013 would allow us to sample and probably define the plume

~~However~~, this non-permitted unit might cause implementation of corrective action procedures.

Under CERCLA all response area could be addressed<sup>SS</sup> with the implementation of RCRA clean-up standards in the 3008(a) order or a unilateral order, if needed.

Note: A five-year statute of limitation is applicable for the 1985 spill area.

Moore/am/lexitron/disk #1/Doc. #53

MOORE ~~XXXXXX~~

① look at spill as creating  
a regulated unit that  
needs corrective action  
and treat lagoon & a sumu  
(1-2 yrs permitting time)

② b/c PRP did have interim  
status, + had spill in 85,  
use 3008(h) to get  
consent decree

does it effect (2)  
that spill occurred  
after end of  
interim status?

RELEASABLE P. Bullack (NAME)  
5/5/06 (DATE)  
RELEASABLE \_\_\_\_\_ (NAME)  
\_\_\_\_\_ (DATE)